

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
DAVENPORT DIVISION

SADIE LYONS, a minor by her natural  
Mother and next friend, JANE LYONS, and  
JANE LYONS, individually, and BARRY  
LYONS, individually,

No. 3:09cv0168-CRW-CFB

Plaintiffs,

vs.

SPECIAL VERDICT FORM

DOREL JUVENILE GROUP, INC.,  
a corporation,

Defendant.

We, the jury, unanimously return the following verdicts on the questions  
submitted to us:

**Question No. 1:**

Was Dorel Juvenile Group at fault?

Answer "yes" or "no".

ANSWER:

YES

NO

*No*

[If your answer is "no," do not answer Question No. 2.]

**Question No. 2:**

Was the fault of Dorel Juvenile Group a cause of injuries to Sadie Lyons?

Answer "yes" or "no."

ANSWER:

YES

NO

[If your answer to either Question No. 1 or No. 2 is "no," then you shall not assign any fault to  
Dorel Juvenile Group and you will answer no more questions. If your answers to Question Nos.  
1 and 2 are "yes," continue answering questions.]

**Question No. 3:**

In deciding whether the claimed harm to plaintiffs is within the scope of Dorel Juvenile Group's liability for fault, did the harm to plaintiffs arise from the same general types of danger that Dorel should have taken reasonable steps to avoid?

Answer "yes" or "no."

ANSWER:

\_\_\_\_\_  
YES

\_\_\_\_\_  
NO

[If your answer is "no", answer no more questions. If your answer to Question No. 3 is "yes", continue answering questions.]

**Question No. 4:**

Was Jane Lyons at fault?

Answer "yes" or "no."

ANSWER:

\_\_\_\_\_  
YES

\_\_\_\_\_  
NO

[If your answer is "no," do not answer Question No. 5.]

**Question No. 5:**

Was the fault of Jane Lyons a cause of her injuries?

Answer "yes" or "no."

ANSWER:

\_\_\_\_\_  
YES

\_\_\_\_\_  
NO

[If your answer to either Question No. 3 or No. 4 is "no," then you shall not assign any fault to Jane Lyons.]

**Question No. 6:**

What percentage of the total fault do you attribute to Dorel Juvenile Group and/or what percentage of total fault do you attribute to Jane Lyons? The percentages must total 100%. [If you previously found that Jane Lyons was not at fault, or did not cause damage to Sadie, or Jane, or Barry Lyons, enter "0" after her name.]

Answer "yes" or "no."

ANSWER:	Dorel Juvenile Group	_____ %
	Jane Lyons	_____ %
	TOTAL	<u>100</u> %

**Question No. 7:**

State the amount of damages sustained by the plaintiff, Sadie Lyons, as to each of the following items of damage. [Do not take into consideration any reduction of damages due to your allocation of fault (if any) in Question No. 6. If the plaintiff Sadie Lyons has failed to prove any item of damage, enter "0" for that item.]

ANSWER:

a.	Past medical expenses	\$ _____
b.	Present value of future medical expenses	\$ _____
c.	Past loss of function of body	\$ _____
d.	Present value of future loss of body	\$ _____
e.	Past pain and suffering	\$ _____
f.	Present value of future pain and suffering	\$ _____
	Total (add separate items of damage)	\$ <u>_____</u>

**Question No. 8:**

State the amount of damages sustained by the plaintiff, Jane Lyons, as to each of the following items of damage. [Do not take into consideration any reduction of damages due to your allocation of fault (if any) in Question No. 6. If the plaintiff Jane Lyons has failed to prove any item of damage, enter "0" for that item.]

ANSWER:

a.	Past medical expenses	\$ _____
b.	Present value of future medical expenses	\$ _____
c.	Past loss of function of body	\$ _____
d.	Present value of future loss of body	\$ _____
e.	Past pain and suffering	\$ _____
f.	Present value of future pain and suffering	\$ _____
	Total (add separate items of damage)	\$ _____

**Question No. 9:**

State the amount of damages sustained by the plaintiff, Barry Lyons, as to each of the following items of damage. [Do not take into consideration any reduction of damages due to your allocation of fault (if any) in Question No. 6. If the plaintiff Barry Lyons has failed to prove any item of damage, enter "0" for that item.]

ANSWER:

a.	Past loss of parental consortium	\$ _____
b.	Present value of future loss of parental consortium	\$ _____
	Total (add separate items of damage)	\$ _____

DATED June 15, 2011.

\_\_\_\_\_  
Jury Foreperson